



Direct Dial: 843-277-6657

Email: mullins@mcleod-lawgroup.com

March 16, 2023

**Via ECF Filing**

The Honorable Richard M. Gergel  
US District Judge  
PO Box 835  
Charleston, SC 29402

Re.: John Doe, a minor under the age of thirteen years old, by his parent, Mother Doe  
v. Charleston County School District, et al  
Case No.: 2:21-cv-2649-RMG

Dear Judge Gergel,

My firm represents the Plaintiff in the above-referenced matter. The case stems from sexual abuse that occurred downstream from child pornography being found on a former CCSD employee's computer.

Under the current scheduling order, the deadline for discovery is March 23, 2023. However, numerous depositions are scheduled for the first week of May, 2023. The testimony of these witnesses is important to the Plaintiff's claims and the Defendant's defenses. In addition, the Plaintiff has not yet been deposed.

The parties had hoped to reach resolution at the February 9, 2023, mediation with Marvin Infinger in order to obviate the need for these depositions due to the sensitive, volatile nature of the case. Although progress was made at mediation and both sides continue to work with Mr. Infinger, we have not yet been able to reach a settlement.

Therefore, I am respectfully requesting a status conference with Your Honor to address any concerns the Court may have regarding the consent motion to extend the current scheduling order filed by my office earlier today. We are simply asking that the discovery deadline be extended until May 19, 2023. In addition, the proposed order moves the dispositive motions deadline to May 31, 2023 and the trial not before date to June 15, 2023.

I hope the Court will accept my apologies in advance for making this request with consent of all parties. I would not make this request if it was not important. Nor would I make this request if it involved pushing the trial date back any further.

With kind regards, I am

Sincerely,

*s/ W. Mullins McLeod, Jr.*

W. Mullins McLeod, Jr.

WMM/bad

cc: Duke R. Highfield, Esquire  
David A. Anderson, Esquire  
Mark A. Peper, Sr., Esquire  
Marvin D. Infinger, Esquire